

# EXHIBIT A

<b>Event</b>	<b>PAN's Proposed Compromise</b>	<b>BT's Proposed Compromise</b>
Rule 16 Conference		<b>8/21/2023</b>
Rule 26(a)(1) Initial Disclosures		<b>8/25/2023</b>
Submission of Protective Order		<b>9/11/2023</b>
Paragraph 3 Disclosures under Court's Default Standard for Discovery, Including Discovery of Electronically Stored Information		<b>9/21/2023</b>
Plaintiff Production of license agreements (¶ 6(a))		<b>60 days after entry of Protective Order</b>
If Court Order needed to produce license agreements, Plaintiff shall file any necessary proposed orders no later than		<b>45 days after entry of Protective Order</b>
Paragraph 6(b) Disclosures <sup>1</sup> (Identification of Accused Products)		<b>9/21/2023</b>
Paragraph 6(c) Disclosures (Produce Core Technical Documents)		<b>10/17/2023</b>
		<b>11/17/2023</b>
		<b>(PAN proposes limiting to 20 claims)</b>
		<b>(BT believes limits are premature at this stage)</b>
Paragraph 6(d) Disclosures (Initial Infringement Chart)		
		<b>12/22/2023</b>
		<b>(PAN proposes prior art combinations limited to 5 per claim)</b>
Paragraph 6(e) Disclosures (Initial Invalidity Chart)		

<sup>1</sup> Rule 16 Scheduling Order - Patent - Revised 03/22 found at <https://www.ded.uscourts.gov/judge/magistrate-judge-christopher-j-burke>

	<b>(BT believes limits are premature at this stage)</b>	
Exchange claim constructions (¶ 12)	<b>3/22/2024</b>	<b>1/23/2024</b>
Submission of Joint Claim Construction Chart (¶ 12)	<b>4/18/2024</b>	<b>2/23/2024</b>
Plaintiffs to serve Opening Claim Construction Brief (¶ 13)	<b>5/17/2024</b>	<b>3/25/2024</b>
Defendants to serve Answering Claim Construction Brief	<b>6/17/2024</b>	<b>4/24/2024</b>
Plaintiffs to serve Reply CCB	<b>7/01/2024</b>	<b>5/8/2024</b>
Defendant to serve sur-reply CCB	<b>7/15/2024</b>	<b>5/22/2024</b>
Interim Status Report	<b>7/22/2024</b>	<b>5/29/2024</b>
Filing of Joint Claim Construction Brief	<b>7/22/2024</b>	<b>5/29/2024</b>
Substantial completion of document production	<b>8/22/2024</b>	<b>6/26/2024</b>
Markman Hearing (¶ 14)	<b>9/23/2024</b>	<b>6/26/2024</b>
Claim Construction Order (Assumed) <sup>2</sup>	<b>11/22/2024</b>	<b>8/26/2024</b>
Joinder of other parties and amendment of pleadings	<b>12/23/2024</b>	<b>9/24/2024</b>
Final infringement contentions (¶ 6(f))	<b>12/23/2024</b> <b>(PAN proposes to limit asserted claims to 10)</b>	<b>9/24/2024</b> <b>(BT believes limits are premature at this stage)</b>
Final invalidity contentions (¶ 6(g))	<b>1/23/2024</b> <b>(PAN proposes to limit prior art combinations to 3 per claim)</b>	<b>10/8/2024</b> <b>(BT believes limits are premature at this stage)</b>
Close of fact discovery (¶ 7(a))	<b>2/21/2025</b>	<b>10/28/2024</b>

<sup>2</sup> The following deadlines assume the Court will issue its Claim Construction Order on or before the proposed dates.

Opening expert reports by the party with initial burden of proof (¶ 7(f)(i))	<b>3/14/2025</b>	<b>11/18/2024</b>
Rebuttal expert reports	<b>4/14/2025</b>	<b>12/18/2024</b>
Reply expert reports	<b>4/28/2025</b>	<b>1/2/2025</b>
Close of expert discovery	<b>5/28/2025</b>	<b>1/31/2025</b>
Dispositive Motions	<b>7/14/2025</b>	<b>2/18/2025</b>
Objection to Expert Testimony	<b>7/14/2025</b>	<b>2/18/2025</b>
Hearing on Dispositive Motions / Objections	<b>8/29/2025</b>	<b>3/31/2025</b>
Pretrial Conference	<b>11/14/2025</b>	<b>5/30/2025</b>
Trial	<b>December 2025</b>	<b>June 2025</b>